SWR# ___30449_____

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: **___L-3 Communications, Integrated Systems_____**
Facility Address: **___10001 Jack Finney Blvd., Greenville, Hunt County, TX_____**
Facility EPA ID #: **____TXD007365984_____**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

__X__ If yes - check here and continue with #2 below.

_____ If no - re-evaluate existing data, or

_____ if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e.,

RCRIS status codes must be changed when the regulatory authorities become aware ofcontrary information).

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective " levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

_X___ If yes - continue after identifying key contaminants, citing appropriate " levels," and referencing supporting documentation.

_____ If no - skip to #8 and enter " YE" status code, after citing appropriate " levels," and referencing supporting documentation to demonstrate that groundwater is not " contaminated."

_____ If unknown - skip to #8 and enter " IN" status code.

Rationale and Reference(s):_____

At the Airplane Preparation Area (APA): TCE - 120 mg/L; Methylene Chloride - present as NAPL and 190 mg/L; 1,2 DCA - 110 mg/L; 1,2-DCE - 62 mg/L; benzene - 4 mg/L (*Site Wide Groundwater Sampling & Alleyway Investigation Letter Report*, May, 2003; *Summary Report Interim System APA for Period Nov. 2002 to Jan. 2003*, March 2003 **)**

At the Former Burn Pit Area - 1,2 DCE - 7.5 mg/L; vinyl Chloride - 6.5 mg/L
(*Site Wide Groundwater Sampling & Alleyway Investigation Letter Report*, May, 2003**)**

At the North Lagoon Waste Management Area - 1,2 DCA - 74 mg/L; TCE - 1.5 mg/L
(*Semi-Annual Groundwater Monitoring & Corrective Action System Report for Period Jan 1st to June 30th 2003*, July, 2003**)**

At the Alleyway: 1,1 - DCE - 24 mg/L; TCE - 1.5 mg/L; arsenic - 1.5 mg/L (*Site Wide Groundwater Sampling & Alleyway Investigation Letter Report*, May, 2003**)**

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Footnotes:

[1]" Contamination" and " contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate " levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within " existing area of contaminated groundwater"[2] as defined by the monitoring locations designated at the time of this determination)?

__X__ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the " existing area of groundwater contamination"[2]).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the " existing area of groundwater contamination"[2]) - skip to #8 and enter " NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter " IN" status code.

Rationale and Reference(s):_____

The contaminated groundwater bearing unit is separated from a lower unit by a shale layer that is approximately 100 feet in thickness. There are two groundwater recovery system in operation at the facility - one at the North Lagoon Area and one at the APA. A soil vapor recovery system is also being tested at the APA. These recovery systems help maintain the horizontal extent of the groundwater plumes. The extent of the groundwater plume at the North Lagoon Area is also monitored semi-annually as part of a Compliance Plan (*Summary Report Interim System APA for Period Nov. 2002 to Jan. 2003*, March 2003; *Semi-Annual Groundwater Monitoring & Corrective Action System Report for Period Jan 1st to June 30th 2003*, July, 2003**).**

The groundwater plumes at the Former Burn Pit and at the Alleyway does not appear to be expanding, based on ongoing groundwater monitoring data. (*Site Wide Groundwater Sampling & Alleyway Investigation Letter Report*, May, 2003**;** Meeting Summary report, July 16, 2002; *Affected Property Assessment Report - Former Burn Pit*, Jan. 2002).

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[2] " existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of " contamination" that can and will be sampled/tested in the future to physically verify that all " contaminated" groundwater remains within this area, and that the further migration of " contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

4. Does " contaminated" groundwater **discharge** into **surface water** bodies?

__**X**__ If yes - continue after identifying potentially affected surface water bodies.

_____ If no - skip to #7 (and enter a " YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater " contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter " IN" status code.

Rationale and Reference(s):_____

An earthen ditch runs through the groundwater plume at the APA. The ditch is typically dry and only carries storm-water during rain events. There might be connectivity between groundwater and the ditch during these storm events. The ditch empties to the Sabine River which discharges into Lake Tawakoni (*Response to Comments - TNRCC Letter Dated July 5, 2002*, Oct. 4, 2002; Affected *Property Assessment Report - Airplane Preparation Area*, Jan. 2002).

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5. Is the **discharge** of " contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater " level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_X___ If yes - skip to #7 (and enter " YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[3] of key contaminants discharged above their groundwater " level," the value of the appropriate " level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of " contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[3] of each contaminant discharged above its groundwater " level," the value of the appropriate " level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater " levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter " IN" status code in #8.

Rationale and Reference(s):_____

Groundwater samples APA-Ditch and APA-Ditch-2 were collected at edge of the drainage ditch. The maximum concentration of contaminants detected were: 1,2-DCA - 18.3 µg/L; vinyl chloride - 5.4 µg/L (Affected *Property Assessment Report - Airplane Preparation Area*, Jan. 2002). **Groundwater contamination at the APA is presently being controlled by an extraction system** (*Site Wide Groundwater Sampling & Alleyway Investigation Letter Report*, May, 2003).

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[3] As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g.,

hyporheic) zone.

6. Can the **discharge** of" contaminated" groundwater into surface water be shown to be " **currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment " levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of" contaminated" groundwater can not be shown to be " **currently acceptable**") - skip to #8 and enter " NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter " IN" status code.

Rationale and Reference(s):_____
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[4] Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

[5] The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently

unacceptable impacts to the surface waters, sediments or eco-systems.

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the " existing area of contaminated groundwater?"

__X__ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the " existing area of groundwater contamination."

_____ If no - enter " NO" status code in #8.

_____ If unknown - enter " IN" status code in #8.

Rationale and Reference(s):_____

A quarterly groundwater monitoring and sampling program is in effect for all AOC's on this property. An extraction system is installed at the APA to inhibit movement of contaminants and remove VOC's. Feasibility studies are being planned for the other AOC's. (*Government Performance and Results Act Environmental Indicators*, Aug. 2003)

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

_**X**___ YE - Yes, " Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the " Migration of Contaminated Groundwater" is " Under Control" at the _L-3 Communications facility , EPA ID # TXD007365984, located at 10001 Jack Finney Blvd., Greenville, Texas. Specifically, this determination indicates that the migration of" contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the " existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

_____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

_____ IN - More information is needed to make a determination.

Completed by (signature)_____ Date _____
(print) Catherine Liu_____
(title) TCEQ CAS Project Manager_____

Supervisor (signature)_____ Date _____
(print)_____
(title)_____
(EPA Region or State)_____

Locations where References may be found:

Attach a copy of this facility's database printout. Highlight the reports which support the "YE" determination._____
_TCEQ Central Records_____
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Contact telephone and e-mail numbers

(name)__Catherine Liu_____
(phone #)_(512) 239-6678_____
(e-mail)___cliu@tceq.state.tx.us_____

Final Note: The purpose of the Migration of Contaminated Groundwater EI is to verify that the

groundwater plume is stable. A "YE" determination does not constitute a screening tool to end the corrective action process. The "YE" determination may be changed at any time as new information becomes available.